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Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JONATHAN ROBERT RISSE-SANTOS,

Defendant.

Case No. 2:21-mj-00283-EJY

Stipulation to Continue Preliminary Hearing (First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
for the United States of America, and Daniel Lippmann, Esq., counsel for the defendant
John Robert Risse-Santos, that the Preliminary Hearing currently scheduled on Thursday,
January 15, 2021, at 4:00 p.m., be vacated and continued to a time convenient to the Court but no
longer than 60 days. This Stipulation is entered into for the following reasons:

1. The parties require additional time to discuss the potential for a Pre-Indictment negotiation.

2. Counsel for the defendant will require additional time to review and investigate discovery and meet with the client to discuss the details prior to proceeding.

3. The Defendant is in custody and does not object to the continuance.

1 4. The parties agree to the continuance.

2 5. Additionally, denial of this request for continuance could result in a miscarriage of
3 justice.

4 6. The additional time requested by this stipulation is excludable in computing the
5 time within which the defendant must be indicted and the trial herein must commence pursuant
6 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
7 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

8 7. This is the first request for continuance filed herein.

9

10 DATED this 13th day of April, 2021.

11

12 CHRISTOPHER CHIOU
13 Acting United States Attorney

14 _____
15 /s/ *Bianca R. Pucci*
16 BIANCA R. PUCCI
17 Assistant United States Attorney

18 _____
19 /s/ *Daniel Lippmann*
20 DANIEL LIPPMANN
21 Attorney for Defendant:
22 JONATHAN ROBERT RISSE-SANTOS

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

5 Case No. 2:21-mj-00283-EJY

6 Plaintiff,

7 **ORDER**

8 v.

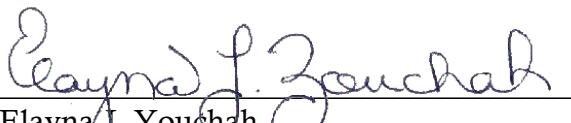
9 JONATHAN ROBERT RISSE-SANTOS,

10 Defendant.

11 Based on the Stipulation of counsel, good cause appearing therefore:

12 IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on
13 Thursday, April 15, 2021 at the hour of 4:00 p.m., be vacated and continued to June 14,
14 2021 at the hour of 4:00 p.m. in Courtroom 3B.

15 DATED this 13th day of April, 2021.

16 
17 Elayna J. Youschah
18 United States Magistrate Judge